CONSUMER FINANCIAL PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL SOLUTIONS, LLC), et al.,

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

CASE NO. 24-cv-40 EAW-MJR

JOINT STIPULATION FOR ENTRY OF PROPOSED STIPULATED PRELIMINARY INJUNCTION AS TO DEFENDANT TIMOTHY F. BURNETTE

Plaintiffs Consumer Financial Protection Bureau (CFPB), the People of the State of New York by Letitia James, Attorney General of the State of New York (NYAG), the State of Colorado *ex rel*. Philip J. Weiser, Attorney General, the State of Delaware, the People of the State of Illinois through Attorney General Kwame Raoul, the State of Minnesota by its Attorney General Keith Ellison, the State of North Carolina ex rel. Jeff Jackson, Attorney General, and the State of Wisconsin (collectively, Plaintiffs) and Defendant Timothy F. Burnette, respectfully request that the Court enter the attached, proposed Stipulated Preliminary Injunction as to Timothy F. Burnette, without further proceedings or appearances and without further notice to any party.

SO STIPULATED AND AGREED

FOR PLAINTIFFS:

CONSUMER FINANCIAL PROTECTION BUREAU

/s/ Vanessa Buchko

Vanessa Buchko

E-mail: vanessa.buchko@cfpb.gov

Phone: 202-295-7246

Joseph Sanders

E-mail: joseph.sanders@cfpb.gov

Phone: 202-377-9846 1700 G Street NW Washington, DC 20552 Facsimile: (202) 435-7722

THE PEOPLE OF THE STATE OF NEW YORK

LETITIA JAMES

Attorney General of the State of New York

/s/ Genevieve S. Rados

Christopher L. Boyd

Genevieve S. Rados

Assistant Attorneys General

350 Main Street, Suite 300A

Buffalo, NY 14202

Phone: (716) 853-8457

Email: Genevieve.rados@ag.ny.gov

Attorneys for the State of New York

STATE OF COLORADO, ex rel. Philip J. Weiser, Attorney General

PHILIP J. WEISER

Attorney General State of Colorado

/s/ Kevin J. Burns

Kevin J. Burns, CO Reg. No. 44527

(pro hac vice)

Senior Assistant Attorney General

Colorado Department of Law

Ralph L. Carr Judicial Center

Consumer Protection Section

1300 Broadway, 9th Floor Denver, CO 80203

Phone: (720) 508-6110 Kevin.Burns@coag.gov Attorney for Plaintiff State of Colorado, ex rel. Philip J. Weiser, Attorney General

STATE OF DELAWARE

KATHLEEN JENNINGS Attorney General State of Delaware

/s/ Maryanne Donaghy Marion M. Quirk (pro hac vice) **Director of Consumer Protection** Deputy Attorney General Maryanne Donaghy (pro hac vice) **Deputy Attorney General** Delaware Department of Justice 820 N. French Street, 5th Floor Wilmington, DE 19801 Phone: (302) 683-8843 Maryanne.donaghy@delaware.gov

Attorney for State of Delaware

STATE OF ILLINOIS

KWAME RAOUL Attorney General State of Illinois

By: /s/ Amanda E. Bacoyanis Greg Grzeskiewicz, Chief, Consumer Fraud Bureau Pro hac vice application forthcoming, if required Amanda E. Bacoyanis (pro hac vice), Assistant Attorney General, Consumer Fraud Bureau Matthew Davies (pro hac vice), Supervising Attorney, Consumer Fraud Bureau Office of the Illinois Attorney General 115 S. LaSalle St., 26th Floor Chicago, Illinois 60603

STATE OF MINNESOTA

KEITH ELLISON Attorney General of Minnesota

/s/ Evan Romanoff

Evan Romanoff (pro hac vice) **Assistant Attorney General**

445 Minnesota Street, Suite 600 St. Paul, Minnesota 55101-2130

Telephone: (651) 728-4126 evan.romanoff@ag.state.mn.us

Attorney for the State of Minnesota

STATE OF NORTH CAROLINA, ex rel. Jeff Jackson, Attorney General

JEFF JACKSON Attorney General of North Carolina

/s/ M. Lynne Weaver

M. Lynne Weaver (pro hac vice) Special Deputy Attorney General N.C. State Bar No. 19397 114 W. Edenton Street Raleigh, NC 27602 Telephone: (919) 716-6039 lweaver@ncdoj.gov

Attorney for the State of North Carolina

STATE OF WISCONSIN

JOSHUA L. KAUL Attorney General of Wisconsin

/s/ Lewis W. Beilin

Lewis W. Beilin (pro hac vice) **Assistant Attorney General** Wisconsin Department of Justice 17 West Main Street Post Office Box 7857 Madison, WI 53707-7857 (608) 266-1221 Lewis.Beilin@wisdoj.gov Attorney for State of Wisconsin

FOR DEFENDANT TIMOTHY F. BURNETTE

NIXON PEABODY LLP

/s/Mark Molloy 40 Fountain Plaza, Suite 500 Buffalo, New York 14202

DEFENDANT TIMOTHY F. BURNETTE